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March 31, 2017

VIA ECF

The Honorable Alvin K. Hellerstein, U.S.D.J.
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Sharma v. Theatre Development Fund, Inc.*
Case No.: 1:17-cv-00189-AKH

Dear District Judge Hellerstein:

We represent defendant Theatre Development Fund, Inc. (“TDF”) in the above-referenced case. We write pursuant to Rule 1.D. of the Court’s Individual Rules to request an enlargement of time for TDF to respond to the complaint. The discussions between counsel for the parties, reported in our prior correspondence to the Court, continue to date. Plaintiff’s counsel have represented that they have completed their review and assessment of the documents produced by TDF, as part of those discussions.

Counsel are discussing options including a possible amendment of the complaint, consent to referral to mediation, and settlement. Under the current schedule, TDF’s response to the complaint would otherwise be due April 3, 2017. The parties, however, require additional time to continue their discussions and to explore these options, including, but not limited to, a meeting between TDF and our law firm, which due to varying availabilities, could only be scheduled for the late afternoon of April 3, 2017, at the earliest. We have conferred with plaintiff’s counsel, and they consent to this request for an extension of time to allow the parties to continue their discussions and to explore a resolution of this matter.

Therefore, and with plaintiff’s consent, we respectfully request that the time for TDF to respond to the complaint be enlarged by thirty days, to May 3, 2017.

Respectfully submitted,

David Grech

David J. Grech

cc: Chambers (*via fax*)
All Attorneys of Record (*via ECF*)